

Naomi Levelle Haslitt, OSB No. 075857
naomi.haslitt@millernash.com
Cody J. Elliott, OSB No. 091027
cody.elliott@millernash.com
MILLER NASH GRAHAM & DUNN LLP
3400 U.S. Bancorp Tower
111 S.W. Fifth Avenue
Portland, Oregon 97204
Telephone: 503.224.5858
Facsimile: 503.224.0155

Attorneys for Defendant
Oregon State University

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

REGINIA GRIDER,

Case No. 6:20-cv-01176-MC

Plaintiff,

PROPOSED CASE MANAGEMENT
SCHEDULE

v.

OREGON STATE UNIVERSITY,

Defendant.

On October 23, 2020, the parties held a video Rule 26 conference. In accordance with Fed R Civ P 26(f), the parties submit the following proposed case-management schedule.

Proposed Case Management Schedule

1. Initial Disclosures. The parties will exchange the initial disclosures required by LR 26-7 on or before November 16, 2020. The parties do not propose any other changes to the time, form, or requirement for disclosures under LR 26-7.

2. Subjects, Timing, and Proposed Discovery Cutoff. The parties anticipate first engaging in fact discovery regarding the allegations, claims, and defenses in this case, and engaging in damages and expert discovery only after the court rules on any dispositive motions. The parties believe that a fact discovery cutoff of April 2, 2021, would be appropriate.

The parties will schedule their discovery in such a way as to require all responses to discovery to be served before the cutoff date, and to file any motions relating to discovery within the discovery period unless it is impossible or impractical to do so. If the parties are unable to reach agreement on any matter related to discovery, they will arrange a conference with the court.

3. Electronically-Stored Information. The parties have not identified any issues regarding the discovery of electronically-stored information at this time. If any issues arise regarding the discovery, disclosure, or preservation of electronically-stored information, the parties will attempt to resolve them before seeking the court's assistance. The parties will confer regarding the best method for production of ESI, including appropriate search terminology, and will confer if there is an issue with method of production.

4. Claims of Privilege, Protection of Confidentiality, and Proposed Agreements. The parties have conferred about potential issues regarding education records protected from disclosure by the Family Educational Rights and Privacy Act ("FERPA"). The parties will address and confer on any issues with FERPA-protected documents, documents reflecting personnel matters concerning other University employees, and claims of privilege as they arise. The parties agree that upon request by the opposing party, a privilege log will be provided that complies with FRCP 26(b)(5)(A)(ii).

5. Settlement. The parties have conferred regarding settlement, and will continue to evaluate the potential for settlement throughout the discovery process.

6. Proposed Case-Management Schedule. The parties request that the court enter a scheduling order with the following proposed dates:

Event	Proposed Date
Fact Discovery Deadline	April 2, 2021
Dispositive Motions	May 21, 2021*
Expert Disclosures and Discovery	TBD after ruling on dispositive motions
Joint ADR Report	30 days after ruling on dispositive motions
Joint Proposed Pretrial Order & Verdict Form	TBD after ruling on dispositive motions
Trial Documents	TBD after ruling on dispositive motions
Pretrial Conference	TBD after ruling on dispositive motions
Trial	TBD after ruling on dispositive motions

* The parties are free to file dispositive motions before this date.

DATED this 30th day of October, 2020:

HARMON JOHNSON LLC

MILLER NASH GRAHAM & DUNN LLP

s/Erious Johnson, Jr.

Erious Johnson, Jr., OSB No. 130574
 ejohnson.hjllc@gmail.com
 1415 Commercial Street S.E.
 Salem, Oregon 97302
 Phone: (503) 991-8545
 Fax: (503) 622-8545

*Attorney for Plaintiff
 Reginia Grider*

4815-3276-9487.1

s/Cody J. Elliott

Naomi Levelle Haslitt, OSB No. 075857
 naomi.haslitt@millernash.com
 Cody J. Elliott, OSB No. 091027
 cody.elliott@millernash.com
 111 S.W. Fifth Avenue, Suite 3400
 Portland, Oregon 97204
 Phone: (503) 224-5858
 Fax: (503) 224-0155

*Attorneys for Defendant
 Oregon State University*